

**BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

Investigation of Area Code Relief for the)	05-TN-100
715 Area Code in Northern Wisconsin)	

AT&T's Comments On Area Code Relief for the 715 and 920 Area Codes In Wisconsin

I. Introduction and Background Information

Per the Commission's May 16, 2008 Area Code Relief Implementation Data Request, AT&T Wisconsin,¹ along with AT&T Mobility² and AT&T CLEC³ (collectively, "AT&T") provides these comments on the 715 and 920 area code relief plans for northern and eastern Wisconsin. The April 2008 area code forecasts by NeuStar, Inc. in its role as North American Numbering Plan Administrator ("NANPA") indicates that the 715 area code is now expected to exhaust in the first quarter of 2011, while the 920 area code is expected to exhaust in the fourth quarter of 2011.

AT&T strongly supports the industry recommended all-services distributed overlay (the "Overlay") relief plan as the best alternative for area code relief for both the 715 and 920 area codes. Pursuant to the Public Service Commission of Wisconsin's ("Commission") data request, AT&T will comment on the customer education and / or implementation issues that may arise for AT&T that are specific to the various scenarios presented by the Commission.

¹ Wisconsin Bell, Inc. now does business as "AT&T Wisconsin."

² AT&T Mobility (formerly known as Cingular) has the following legal entities operating in Wisconsin: Milwaukee SMSA Limited Partnership, New Cingular Wireless PCS, LLC, Madison SMSA Limited Partnership and properties fka American Cellular Corporation (ACC).

II. Scenario Where The Overlay is Selected as the Commission's Preferred Method of Relief in Both the 715 and 920 Area Codes

Assuming that the Commission selects the Overlay as the preferred method of relief in both the 715 and 920 area codes, the following customer education issues would apply. Two customer notices need to be issued before the start of permissive and mandatory dialing detailing the use of 10-digit dialing. Alarm company notification letters would need to be issued as well as a press release issued to the media.

Furthermore, the scenario whereby the Overlay is selected as the Commission's preferred method of relief in both the 715 and 920 area codes presents the following implementation issues. One area code relief project should be fully completed before another one is begun. Permissive and mandatory dialing should begin on a Saturday night, when network traffic is low. Permissive and mandatory dialing should not be started during major holidays.

III. Scenario Where The Overlay is Selected as the Commission's Preferred Method of Relief in One Area Code While a Split is Selected in the Other Area Code

Assuming that the Commission selects the Overlay as the preferred method of relief in one area code while a split is selected in the other area code, the following customer education issues would apply. Two customer notices need to be issued before start of permissive and mandatory dialing detailing the use of 10-digit dialing in the overlay area code. Furthermore, two customer notices need to be issued before start of permissive and

³ AT&T CLEC certificated entities include TCG Milwaukee, Inc. and AT&T Communications of Wisconsin, L.P.

mandatory dialing detailing the NXX that will be switching to the new area code. Two separate press releases would need to be issued detailing each area code relief project in each area code.

The scenario whereby overlay is selected as the Commission's preferred method of relief in one area code while a split is selected in the other presents the following implementation issues. One area code relief project should be fully completed before another one is begun. Service providers should have a longer network preparation time in order to get ready for permissive dialing when numbers need to be working in the old and new area code for an area code split. Permissive and mandatory dialing should begin on a Saturday night, when network traffic is low. Permissive and mandatory dialing should not be started during major holidays. Border towns would need direction on what dialing plan is used between the new area codes.

IV. Scenario Where A Split is Selected as the Commission's Preferred Method in Both the 715 and 920 Area Codes

Assuming that the Commissions selects a split as the preferred method in both the 715 and 920 area codes, the following customer education issues would apply. Two customer notices need to be issued before start of permissive and mandatory dialing detailing the NXX code will be switching to the new area code. Two separate press releases would need to be issued detailing each area code relief project in each area code.

Furthermore, the scenario whereby a split is selected as the Commission's preferred method of relief in both the 715 and 920 area codes presents the following implementation

issues. One are code relief project should be fully completed before another one is begun. Service providers should have a longer network preparation time in order to get ready for permissive dialing when numbers need to working in the old and new area code for an area code split. Permissive and mandatory dialing should begin on a Saturday night, when network traffic is low. Permissive and mandatory dialing should not be started during major holidays. Border towns would need direction on what the dialing plan is between the new area code.

V. Timeframe Issues

The April 2008 area code exhaust projection by NeuStar, Inc. indicates that the 715 area code is nearest to exhaust and has only 85 codes available for assignment. Therefore, AT&T would recommend that 715 area code relief efforts begin first. There are particular problems that may arise if any of the implementation periods for the 715 area code overlap with the implementation periods for the 920 area code. First, customer confusion may arise with implementation dates in contiguous areas. Internal AT&T workforce issues may arise with personnel doing two relief plans at the same time and information technology system work would need to be coordinated.

AT&T highly recommends that one area code relief project be completed prior to another one starting with at least a four (4) month interval between the end of one project and the beginning of another. This would reduce any customer confusion that may arise by having two relief projects going in contiguous areas. Furthermore, this would allow any work such as translations, billing, network engineering and many others to be completed one project at a time.

Furthermore, AT&T requests that the Commission decision on area code relief plans for both area codes not provide specific implementation dates, but rather set a specific number of remaining NXX codes to be utilized as the “trigger.” AT&T suggests an NXX code trigger of fifty (50) to initiate implementation of the project. This mechanism would provide all service providers an opportunity to prepare for either a split or overlay and provide customers with adequate time to get accustomed to any dialing changes or telephone changes that will need to take place.

VI. Dialing Plan Issue – All Scenarios

When NXX codes are protected to allow inter-area code seven digit dialing, these protected NXX codes are effectively unavailable for assignment within the calling area code and reduce the calling area code’s NXX code inventory. Consequently, the most conservative approach is to not allow protected codes to exist for inter-area code calling. AT&T strongly recommends against the creation of protected codes for the purpose of retaining local calling seven digit inter-area code dialing.⁴

CONCLUSION

AT&T continues to encourage the Commission to adopt the Industry’s recommendation of an all-services overlay as the relief plan for the 715 and 920 area codes. On balance, this plan will provide the least impact to the customers in the area. Furthermore, AT&T highly recommends that one area code relief project be completed prior to another

⁴ Inter-area code seven digit dialing to protected codes was eliminated along the new borders established for the 920 and 262 area codes.

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Respectfully submitted,

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